

Objection Deadline: June 19, 2007
Hearing Date: June 26, 2007 @ 10:00 a.m.

WOLLMUTH MAHER & DEUTSCH LLP
One Gateway Center – 9th Floor
Newark, New Jersey 07102
Tel: (973) 733-9200
Attorneys for Flow Dry Technology Inc.
James N. Lawlor, Esq. (JL-6065)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**DELPHI CORPORATION, et. al.,

Debtors.**

Chapter 11

Case Nos. 05-44481 (RDD)

Jointly Administered

**DECLARATION OF JAMES N. LAWLOR
IN SUPPORT OF OPPOSITION OF FLOW DRY TECHNOLOGY INC.
TO DEBTORS' OBJECTION TO FLOW DRY'S PROOF OF CLAIM**

James N. Lawlor declares, pursuant to 28 U.S.C. § 1746, that the following is true:

1. I am an attorney licensed to practice law in the State of New Jersey and am a partner with the law firm of Wollmuth Maher & Deutsch LLP, counsel to Flow Dry Technology Inc. ("Flow Dry"). I submit this affidavit in support of Flow Dry's Opposition to the Debtors' Fifteenth Omnibus Objection (Substantive). I submit this affidavit based upon personal knowledge and upon documentary information provided to me.
2. Attached hereto as **Exhibit A** are true and correct copies of the letter, dated December 7, 2005, and itemized statement of the amount due, sent by Flow Dry to the Debtors and Debtors' counsel.
3. Attached hereto as **Exhibit B** is a true and correct copy of Flow Dry's Proof of Claim dated June 20, 2006.

I, James N. Lawlor, declare under penalty of perjury that the foregoing information is true and correct. Executed on June 19, 2007, at Newark, New Jersey:

By: /s/ James N. Lawlor
James N. Lawlor

EXHIBIT A

DUNLEVEY, MAHAN & FURRY

ROBERT T. DUNLEVEY, JR.
CHARLES W. MAHAN
STEPHEN A. WATRING
GARY W. AUMAN
GARY T. BRINSFIELD
WILLIAM H. BARNEY, III
RICHARD L. CARR, JR.

A LEGAL PROFESSIONAL ASSOCIATION
110 NORTH MAIN STREET, SUITE 1000
DAYTON, OHIO 45402-1738
TEL: (937) 223-6003 FAX: (937) 223-8550
www.dmfdayton.com

DONALD B. RINEER**
AMY C. MITCHELL
LAURIE DENDWICK-GORDON
OF COUNSEL
RICHARD L. FURRY*
*ALSO ADMITTED IN ILLINOIS
**ALSO ADMITTED IN INDIANA

December 7, 2005

VIA REGULAR MAIL

John Wm. Butler, Jr.
John K. Lyons
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606

VIA CERTIFIED MAIL

Delphi Automotive Systems LLC
5725 Delphi Dr.
Troy, MI 48098

Kayalyn A. Marafioti
Thomas J. Matz
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036

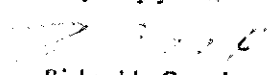
**Re: Ohio Molder's Liens of Flow Dry Technology Ltd.
In Re: Delphi Corporation, et al., United States Bankruptcy Court,
Southern District of New York, Case No. 05-44481**

Dear Counsel:

This office represents Flow Dry Technology Ltd., an Ohio limited liability company ("Flow Dry"). As contemplated by Delphi's Lien Claimants Motion, you are notified that Flow Dry has a lien on two plastic injection molds owned by Delphi pursuant to Ohio Revised Code Section 1333.31, Ohio's molder's lien law. These molder's liens are perfected by Flow Dry's possession of the molds, which molds Flow Dry was in possession of prior to the bankruptcy filing and has continually possessed since. The enclosed spreadsheet contains an itemized statement of the amount due as of October 8, 2005 and includes references to Delphi purchase orders. The molds are described as follows: two (2) plastic injection molds to produce Delphi part no. 6562225; and one (1) plastic injection mold to produce Delphi part no. 52487643 which is a component of part no. 52487644. This notice is given to notify you of Flow Dry's secured creditor status and is not an attempt to collect from the debtor.

Flow Dry requests to be treated as a lien claimant under the Lien Claimants Order with respect to the amounts due to Flow Dry secured by the liens referenced herein (the total amount of \$96,831.00; see enclosed spreadsheet) in connection with these molds (I note that \$45,466.20 of this amount is the subject of a reclamation demand made by Flow Dry, being claim number 25, as amended, as set forth in the enclosed spreadsheet). In addition to these pre-petition amounts owed, Flow Dry continues to run parts on these molds so the amount secured by the liens referenced herein will necessarily change.

Very truly yours,


Richard L. Carr, Jr.

RLC/sjs

Enclosures: Spreadsheet

DUNLEVEY, MAHAN & FURRY

John Wm. Butler, Jr.
John K. Lyons
Kayalyn A. Marafioti
Thomas J. Matz
Delphi Automotive Systems LLC
December 7, 2005

Cc: Flow Dry Technology Ltd, Attn: Douglas McCoskey, President (via regular mail)
Deirdre A. Martini, United States Trustee (via regular mail)

Delphi Plastic Molds Summary

Part number 6562225

Plastic Injection Mold \$55,000.00

PO# HH49278 issued 7/18/02

Invoices in Reclamation Claim for Part number 6562225

Packing slip /Invoice number	Date	Amount of Invoice
006818/25769	9/22/2005	\$ 4,608.00
006915/25851	9/29/2005	\$ 4,608.00
Total		\$ 9,216.00

PO#

550057723

550057723

Other open invoice Pre-Bankruptcy Part number 6562225

Packing slip /Invoice number	Date	Amount of Invoice
006407/25411	8/25/2005	\$ 3,456.00
006502/25500	9/1/2005	\$ 3,456.00
Total		\$ 6,912.00

550057723

550057723

Delphi Part number 52487643 component part number 52487644

Plastic Injection mold \$32,500.00

PO# HH94184 issued 3/20/2001

Invoices in Reclamation Claim for Part number 52487644

Packing slip /Invoice number	Date	Amount of Invoice
006881/25848	9/28/2005	\$ 7,144.20
006912/25854	9/29/2005	\$ 5,292.00
006913/25875	9/29/2005	\$ 4,762.80
006949/25897	9/30/2005	\$ 4,762.80
006967/25907	10/3/2005	\$ 4,762.80
006984/25921	10/4/2005	\$ 4,762.80
007046/25970	10/7/2005	\$ 4,762.80
Total		\$ 36,250.20

550057654

550057825

550057654

550057654

550057654

550057654

550057654

Other open invoices Pre-Bankruptcy Part number 52487644

Packing slip /Invoice number	Date	Amount of Invoice
006218/25244	8/11/2005	\$ 5,292.00
006404/25415	8/25/2005	\$ 5,292.00
006501/25518	9/1/2005	\$ 4,762.80
006499/25502	9/1/2005	\$ 5,292.00
006520,006555/25581	9/6/2005	\$ 14,288.40
008854/25808	9/26/2005	\$ 4,762.80
008865/25821	9/27/2005	\$ 4,762.80
Total		\$ 44,452.80

550057825

550057825

550057654

550057825

550057654

550057654

550057654

EXHIBIT B

UNITED STATES BANKRUPTCY COURT <u>Southern</u> DISTRICT OF <u>New York</u>		PROOF OF CLAIM
Name of Debtor <u>Delphi Corporation</u>		Case Number <u>05-44481</u>
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A "request" for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (The person or other entity to whom the debtor owes money or property): <u>Flow Dry Technology Ltd</u>		<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court in this case. <input type="checkbox"/> Check box if the address differs from the address on the envelope sent to you by the court.
Name and address where notices should be sent: <u>Flow Dry Technology Ltd</u> <u>379 Albert Rd</u> <u>Brookville OH 45309-924</u>		
Telephone number: <u>937-833-2161</u>		THIS SPACE IS FOR COURT USE ONLY
Account or other number by which creditor identifies debtor: <u>\$ 16000</u>		Check here <input type="checkbox"/> replaces if this claim <input type="checkbox"/> amends a previously filed claim, dated: _____
1. Basis for Claim <input checked="" type="checkbox"/> Goods Sold / Services Performed <input type="checkbox"/> Customer Claim <input type="checkbox"/> Taxes <input type="checkbox"/> Money Loaned <input type="checkbox"/> Personal Injury <input type="checkbox"/> Other _____ <input type="checkbox"/> Retiree benefits as defined in 11 U.S.C. § 1114(a) <input type="checkbox"/> Wages, salaries, and compensation (fill out below) Last four digits of SS #: _____ Unpaid compensation for services performed from _____ to _____ <div style="text-align: center;">(date) (date)</div>		
2. Date debt was incurred: <u>8/11/05, 8/25/05, 9/1/05</u>		3. If court judgment, date obtained: _____
4. Total Amount of Claim at Time Case Filed: \$ _____ (unsecured) <u>22,258.80</u> (secured) _____ (priority) <u>22,258.80</u> (Total) If all or part of your claim is secured or entitled to priority, also complete Item 5 or 7 below. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all interest or additional charges.		
5. Secured Claim. <input checked="" type="checkbox"/> Check this box if your claim is secured by collateral (including a right of setoff). Brief Description of Collateral: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input checked="" type="checkbox"/> Other <u>production mold</u> Value of Collateral: \$ <u>87,500.00</u> Amount of arrearage and other charges at time case filed included in secured claim, if any: \$ <u>22,258.80</u>		7. Unsecured Priority Claim. <input type="checkbox"/> Check this box if you have an unsecured priority claim Amount entitled to priority \$ _____ Specify the priority of the claim: <input type="checkbox"/> Wages, salaries, or commissions (up to \$10,000)* earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(3). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Up to \$2,225* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(6). <input type="checkbox"/> Alimony, maintenance, or support owed to a spouse, former spouse, or child - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). <small>*Amounts are subject to adjustment on 4/1/07 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment. \$10,000 and 180-day limits apply to cases filed on or after 4/20/05. Pub. L. 109-8</small>
6. Unsecured Nonpriority Claim \$ _____ <input type="checkbox"/> Check this box if: a) there is no collateral or lien securing your claim, or b) your claim exceeds the value of the property securing it, or if c) none or only part of your claim is entitled to priority.		THIS SPACE IS FOR COURT USE ONLY
8. Credits: The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim.		
9. Supporting Documents: Attach copies of supporting documents, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary.		
10. Date-Stamped Copy: To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim		
Date <u>6/20/06</u>	Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any): <u>Robert Anderson, Robin Anderson, Controller</u>	

